

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

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IN RE MUTUAL FUNDS INVESTMENT)	Honorable J. Frederick Motz MDL 1586
LITIGATION)	
)	Civil Action No. 04-MD-15863
IN RE ALGER, COLUMBIA, JANUS,)	
MFS, ONE GROUP, PIMCO AND)	
PUTNAM (the "PUTNAM TRACK"))	
_____)	
<i>Saunders, et al. v. Putnam American</i>)	Civil Action No. 04-cv-00560
<i>Government Income Fund, et al.</i>)	
("Fund Investor Class Action"))	
)	
<i>Zuber, et al. v. Putnam Investment</i>)	Civil Action No. 04-cv-00564
<i>Management, LLC, et al.</i>)	
("Fund Derivative Action"))	

PUTNAM EMPLOYEE DEFENDANTS'
MOTION FOR ENTRY OF FINAL JUDGMENT

Defendants Justin Scott, James Prusko, Carmel Peters, Geirulv Lode, and Frank Perfetuo ("Putnam Employee Defendants") respectfully move for entry of Final Judgment pursuant to Rule 54(b) of the Federal Rules of Civil Procedure. By its Orders, dated March 1, 2006 (See Docket Nos. 1715, 1649, 1885) and July 24, 2006 (Docket No. 2122), this Court has dismissed each of the counts asserted against the Putnam Employee Defendants in the Corrected Consolidated Amended Complaint in *Saunders, et al. v. Putnam American Government Income Fund, et al.* ("Fund Investor Class Action"). Similarly, by its Orders, dated November 3, 2005 (Docket No. 1462), March 1, 2006 (Docket No. 1697), and June 14, 2006 (Docket No. 2066), the Court has dismissed each of the counts propounded against Defendants Scott, Peters, and Lode in the Consolidated Amended Fund Derivative Complaint in *Zuber, et al. v. Putnam Investment Management, LLC, et al.* ("Fund Derivative Action"). Putnam Employee Defendants Prusko and

Perfetuo were not named as defendants in the Zuber Fund Derivative Action. Notably, this court has already entered orders granting the motions for final judgment pursuant to Rule 54(b) for former Putnam employees Omid Kamshad (Docket No. 2365), William Woolverton (Docket No. 2303) and Ian C. Ferguson (Docket No. 2297). These Orders effectively have ended both of these actions against the Putnam Employee Defendants.

On May 14, 2009, the Court issued an Order (attached hereto as Exhibit 1) clarifying its earlier order of April 14, 2009 entering summary judgment on behalf of the Putnam Defendants and Lawrence Lasser, and inviting other parties in this subtrack to seek the entry of final judgment on or before May 29, 2009.

Given the procedural stance of this case, there appears to be no reason to further delay entry of final judgment for the Putnam Employee Defendants. Accordingly, the Putnam Employee Defendants respectfully request that the Court enter final judgment pursuant to Rule 54(b) on the dismissed claims in both the Fund Investor Class Action and Fund Derivative Action.

RESPECTFULLY SUBMITTED,

EMPLOYEE TIMING DEFENDANTS
By Their Respective Counsel

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Dated: May 28, 2009

CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2009, I caused the foregoing to be filed electronically with the Clerk of the Court using the CM/CF system, which will send notification of such filing to all counsel of record.

/s/Peter M. Casey